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Mr. Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Avenue, SW  
Room 4008-So., Ag Stop 0268  
Washington, DC 20250

**RE: Docket No. TM-04-07; National Organic Program, Sunset Review**

The International Banana Association (IBA) is providing these comments to the U.S. Department of Agriculture's (USDA) advance notice of proposed rulemaking regarding the expiration on October 21, 2007 of the allowed use of 165 synthetic and non-synthetic substances in organic food production and handling. 70 Federal Register 35177 (June 17, 2005).

IBA is the trade organization representing the common business interests of the banana industry in North America. IBA members are companies involved in the growing, shipping and importing of bananas into the United States. Taken together, IBA member companies are responsible for marketing virtually all of the bananas consumed in the U.S., including organic bananas. Bananas are the most popular fresh fruit in America with per capita consumption at 28 pounds per year.

IBA supports the renewal of ethylene on the National List for postharvest ripening of tropical fruit. Ethylene is an essential material used on all commercial bananas – both conventional and organic bananas – to provide uniform ripening of the fruit prior to their display in the marketplace. Uniform ripening of bananas is critical for fruit quality and consumer acceptance.

Ethylene is a naturally-occurring plant hormone that differs from other plant hormones in being a gas. Ethylene is produced in nature by plants and plant products like fruits and vegetables, including apples, avocados, bananas, melons, peaches, pears, and tomatoes. In maturing plants, ethylene induces its own biosynthesis, stimulating the ripening of fruit, the opening of flowers, and the abscission of leaves, among other natural plant functions. When fruit development approaches maturity, for example, ethylene is released from plant tissues into the surrounding atmosphere and accelerates the fruit's ripening process.

Bananas do not ripen evenly on the plant. In addition, the lengthy transport time (7-10 days) from farm to market deter banana suppliers from initiating the irreversible fruit ripening process too early in the supply chain. In fact, to prolong the storage time of bananas during their transit to market, naturally-emitted ethylene from the bananas needs

to be controlled in the atmosphere. Therefore, bananas are harvested, transported and stored at an immature development stage under climate-controlled conditions.

The unvarying temperature and humidity settings during transit prevent the onset of banana ripening and spoilage. Before delivery to customers, bananas are exposed to externally-applied ethylene to induce synchronous ripening. Without the use of ethylene in a controlled environment bananas would ripen unevenly and not possess acceptable or desirable texture, color and flavor.

Studies have shown that there are no significant biochemical, chemical, or physiological differences between fruit ripened where the naturally-produced ethylene has been the triggering mechanism or where additional externally-applied ethylene has triggered the process in the mature but unripe fruit. The additional ethylene released into the closed environment simply accelerates the natural ripening process in bananas to produce predictable and acceptable fruit quality in a timely manner.

There are no commercially available or feasible alternatives to ethylene for the ripening of marketable bananas. From an industry perspective, if ethylene was no longer available to use in the handling of organic bananas, then bananas would no longer be available to many consumers of organic foods.

IBA appreciates the consideration of these comments by the National Organic Standards Board and USDA in support of the continued allowance of ethylene for postharvest ripening of tropical fruit labeled as "organic." Please contact me directly at (804) 379-1466 for any questions or discussion on these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Debus', with a stylized flourish at the end.

Tim Debus  
Executive Director